

# EXHIBIT B

**Documentation of revisions to the backup materials of the May 25, 2012 Rebuttal  
Expert Report of Matthew E. Raiff, Ph.D. concerning updates to overcharge  
calculations**  
February 29, 2016

Below is documentation for updates made to the backup materials of the May 25, 2012 Raiff Rebuttal Expert Report. In summary, a single line of code was updated in three of the six Stata programs that calculates damages. The updated code carries through two additional fields (billto\_region and shipto\_region), both of which have previously been disclosed as part of the combined Defendant sales database, to the final damages output file. The calculation of damages remains unchanged. Once the updates outlined below are completed, the Stata programs within the “Damage model\Baseline with more fields\Scripts” folder of the May 25, 2012 Raiff Rebuttal Expert Report backup materials.

- File “Prepare data for client model more\_fields.do”
  - In line 57, replace the text “keep billto\_city” with “keep billto\_region shipto\_region billto\_city”
- File “Damage calculation more\_fields.do”
  - In line 114, replace the text “keep billto\_city” with “keep billto\_region shipto\_region billto\_city”
- File “Combine output files more\_fields.do”
  - In line 20, replace the text “outexcel billto\_city” with “outexcel billto\_region shipto\_region billto\_city”

Once the backup materials have been updated, the withdrawn purchases can be identified in the resulting output file using the following methods:

- Carpenter non-Polyols purchases
  - Purchases with a value of "ARCOL POLYOL GP3000", "ARCOL POLYOL GP3006", or "PLYPRPYLNGYLC" within field “std\_product\_name.”
- Purchases not involving the U.S.
  - Purchases with a value of “BRAZIL” within field “shipto\_city.”
  - Purchases that do not have a value of “USA” in either the “shipto\_region” field or the “billto\_region” field.